

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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AGERE SYSTEMS, INC., CYTEC INDUSTRIES INC., FORD MOTOR COMPANY, SPS TECHNOLOGIES, LLC and TI GROUP AUTOMOTIVE SYSTEMS LLC,	:	
	:	Civil Action No. 02-CV-3830 (LDD)
	:	
Plaintiffs,	:	
v.	:	
ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION, et al.,	:	
	:	
Defendants.	:	

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**CROSS-MOTION FOR SUMMARY JUDGMENT**

Plaintiffs Agere Systems, Inc., Cytec Industries Inc., Ford Motor Company, SPS Technologies, LLC, and TI Group Automotive Systems LLC (“Plaintiffs”) move this Court, pursuant to Fed. R. Civ. P. 56, for entry of a summary judgment that Defendant Advanced Environmental Technology Corporation is jointly and severally liable for all response costs that this Court determines at trial are recoverable under § 107(a) unless AETC proves at trial that the harm is divisible and that damages are capable of some reasonable apportionment.

Dated: July 26, 2007

Respectfully submitted,

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